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Attorneys for Defendants PHH MORTGAGE  
CORPORATION and MSR ASSET VEHICLE LLC  
(formerly LIBERTY HOME EQUITY SOLUTIONS,  
INC.)

***(Caption continues on next page)***

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MICHAELA LANERE, an individual, on  
behalf of herself, and on behalf of all  
persons similarly situated,

Plaintiffs,

v.

PHH MORTGAGE CORPORATION a New  
Jersey corporation, d/b/a LIBERTY  
REVERSE MORTGAGE; LIBERTY HOME  
EQUITY SOLUTIONS a  
California limited liability company and  
DOES 1-50, Inclusive,

Defendants.

Case No. 2:24-cv-00652-DJC-DB

**STIPULATION TO CONTINUE CASE  
DEADLINES AND ORDER**

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1 Plaintiff Michaela Lanere and Defendants PHH Mortgage Corporation (“PHH”)  
2 and MSR Asset Vehicle LLC (formerly Liberty Home Equity Solutions, Inc.) (“Liberty”)  
3 (collectively the “Parties”) hereby submit this Stipulation to Continue Case Deadlines.

4 The Parties stipulate as follows:

5 1. On January 23, 2024, Plaintiff filed her wage-and-hour putative class action  
6 against Defendants PHH, Liberty, Ocwen Financial Insurance Services, Inc., and Ocwen  
7 USVI Services, LLC in the Superior Court of California for the County of Sacramento.

8 2. On February 29, 2024, PHH and Liberty removed this action to the United  
9 States District Court, Eastern District of California.

10 3. On March 5, 2024, the Parties met and conferred to discuss Defendants’  
11 anticipated Motion to Dismiss and/or Strike Plaintiff’s Complaint and Plaintiff’s  
12 anticipated Motion to Remand. The Parties also discussed mediation and potential  
13 settlement of the case.

14 4. Plaintiff agreed to amend her Complaint to address some of the issues  
15 Defendants raised regarding the parties, claims and allegations, and she filed her First  
16 Amended Complaint (“FAC”) on March 6, 2024. The Parties also agreed to mediate the  
17 matter and are currently discussing potential mediators and availability. Further, the  
18 Parties have agreed to seek a 60-day continuance of case deadlines to allow time for  
19 the Parties to agree on a mediator, reserve a mediation date and explore potential  
20 resolution of this matter.

21 5. PHH and Liberty’s deadline to file their responsive pleading to Plaintiff’s  
22 FAC is currently March 20, 2024.

23 6. Plaintiff’s deadline to file her Motion to Remand is currently April 1, 2024.

24 7. The Court has not set a Scheduling Conference, but it has issued an Initial  
25 Case Management Order requiring the Parties to meet and confer and submit a Joint  
26 Status Report within 60 days of service on any party, or from the date of removal, as  
27 required by Rule 26(f) of the Federal Rules of Civil Procedure. The deadline for the  
28 Parties to meet and confer and submit a Joint Status Report is currently April 29, 2024.

1           8.     The Parties have not requested any prior continuances of the matter.

2           9.     Accordingly, to promote judicial economy and efficiency, the Parties  
3 request that the Court continue the case deadlines by 60-days as follows:

4           a.     Deadline for PHH and Liberty to file a responsive pleading: **May 20,**  
5                 **2024;**

6           b.     Deadline for Plaintiff to file her Motion to Remand: **May 31, 2024;**  
7                 and

8           c.     Deadline for Parties to meet and confer and submit a Joint Status  
9                 Report as required by the Court's Initial Case Management Order  
10                and Federal Rules of Civil Procedure 26(f): **June 28, 2024.**

11  
12 IT IS SO STIPULATED.

13 Dated: March 13, 2024

JULIE A. TOTTEN  
ANNIE H. CHEN  
FRANK N. ZALOM

Orrick, Herrington & Sutcliffe LLP

17 By:           /s/ Annie H. Chen            
18           ANNIE H. CHEN  
19           Attorneys for Defendants PHH  
20           MORTGAGE CORPORATION and  
21           MSR ASSET VEHICLE LLC (formerly  
22           LIBERTY HOME EQUITY  
23           SOLUTIONS, INC.)  
24  
25  
26  
27  
28

1 Dated: March 13, 2024

JEAN-CLAUDE LAPUYADE  
MONNETT DE LA TORRE  
ANDREA ALEJANDRA AMAYA SILVA

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5 By: /s/ Jean-Claude LaPuyade  
JEAN-CLAUDE LAPUYADE  
Attorneys for Plaintiff MICHAELA  
LANERE

9 **ATTESTATION**

10 I hereby attest that concurrence in the filing of this document has been obtained  
11 from each of the other signatories hereto.

12 Dated: March 13, 2024

By: /s/ Annie H. Chen  
Annie H. Chen

**ORDER**

The Court having considered the Parties' Stipulation to Continue Case Deadlines and finding good cause, hereby GRANTS the Parties' request to continue case deadlines and ORDERS as follows:

1. The deadline for PHH and Liberty to file a responsive pleading is continued to May 20, 2024;

2. The deadline for Plaintiff to file a Motion to Remand is continued to May 31, 2024; and

3. The deadline for the Parties to meet and confer and submit a Joint Status Report as required by the Court's Initial Case Management Order and Federal Rules of Civil Procedure 26(f) is continued to June 28, 2024.

Dated: March 13, 2024

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE